

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER: 08-44 MEJEREMY NOYES
723 Brown Avenue
Erie, Pennsylvania

UNDER SEAL

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. In and around June 2008 to in and around July 2008 in Erie county, in the Western District of Pennsylvania defendant(s) did, (Track Statutory Language of Offense)

did knowingly transport and ship and attempt to transport and ship, in interstate and foreign commerce, specifically, by computer, visual depictions of a minor, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256.

did knowingly receive, distribute, attempt to receive and attempt to distribute any visual depictions of a minor, that had been shipped and transported in interstate commerce, specifically, by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, in violation of Title 18 United States Code, Section(s) 2252(a)(1) and 2252(a)(2).

I further state that I am a(n) Special Agent Official Title and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No


Signature of Complainant

Sworn to before me and subscribed in my presence,

August 13, 2008

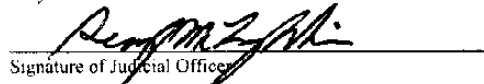
Date

SEAN J. MCLAUGHLIN, U.S. District Judge

Name and Title of Judicial Officer

at Erie, Pennsylvania

City and State


Signature of Judicial Officer

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Magistrate No. *08-44 ME*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Thomas Brenneis, being first duly sworn on oath,
depose and say:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) presently assigned to the Erie, Pennsylvania resident agency of the FBI and have been employed there since January 2007

2. The information set forth below was obtained as a result of my own participation in this investigation, and my experience working cases involving child exploitation.

3. On June 29, 2008, FBI headquarters provided information to the FBI's Erie, Pennsylvania office about an anonymous complaint submitted on the FBI webpage. On June 27, 2008, someone using the name Sally Ann Slokum reported that a person by the name of Jeremy Noyes, 723 Brown Avenue, Erie, Pennsylvania, was attempting over the Internet to obtain a four year old female, named Abby, and her mother Alex, as sex slaves. Slokum reported that Alex and Abby live in New Zealand, but Alex is originally from West Virginia. Slokum further revealed to the FBI that Alex and Abby were supposed to travel to Erie, Pennsylvania from New Zealand

in April 2008 but were delayed by immigration issues and the selling of their house.

4. The portion of the text from the complaint provided by Sally Ann Slokum to the FBI reads as follows:

Jeremy Noyes of 723 Brown Ave in Erie, PA is attempting to obtain a 4 year old female sex slave over the Internet. He is arranging this with the girl=s (sic) mother, who is also to be his sex slave. The woman also gave birth within the last week and the baby is also to be his slave. He has been instructing the woman on how to train the girl including bondage, vaginal and anal dilation, having the girl drink her own urine so she can be a toilet slave, exposing her to pornographic training tapes while masturbating her, and extreme punishments such as locking her in a closet with no food for three days.

5. The information provided to the FBI by Sally Ann Slokum also indicated that Noyes has a collection of child pornography. Slokum also revealed that Noyes has used the website www.collarme.com, the same website where Noyes found Alex, to make contact with other individuals in the United States who are interested in the bondage, dominance, sadism, and masochism lifestyle.

6. Slokum also revealed the following in her tip to the FBI:

Noyes has threatened to kill me and my family so I am not putting my real name on here because he definately (sic) will not rest until we are dead. All the evidence you need is in his computer and that little girl's mind. Please save her.

7. On July 16, 2008 your affiant searched for information about Jeremy Noyes on the Internet search engine Google. The search revealed a listing for a blog hosted by someone using the name "borderlinegrrl". Your affiant then reviewed this blog and discovered an entry matching the exact verbiage provided by Sally Ann Slokum to the FBI which is set forth above at paragraph 15. Other postings on the blog refer to the author of the blog being a classmate of Jeremy Noyes at the Lake Erie College of Osteopathic Medicine. In another entry the author of the blog refers to herself as Libby. A check of the current roster of medical students at the Lake Erie College of Osteopathic Medicine shows a Jeremy Noyes and an Elizabeth Fleming. Your affiant then obtained contact information for both Jeremy Noyes and Elizabeth Fleming from The Lake Erie College of Osteopathic Medicine.

8. On July 21, 2008, your affiant contacted Elizabeth Fleming. Fleming also revealed to your affiant the nature of her relationship with Noyes. Fleming began dating Noyes in January of 2008 after posting an ad on the bondage, dominance, sadism, and masochism website, www.collarme.com. Fleming became a slave to Noyes and participated in a sexual relationship for the next several months.

9. Fleming also revealed to your affiant that over the course of their relationship Noyes told Fleming about a woman from New Zealand named Alex and her four year old daughter, Abbey. Noyes explained to Fleming that he had met Alex on the Internet.

Noyes showed Fleming pictures of Alex and Abbey including one where there were injuries to Alex's legs and buttocks. Alex was bleeding in the photo with multiple gashes and welts. Noyes told Fleming that Alex had explained to Noyes that the injuries to Alex had been caused by an ex-boyfriend and she had not been able to find anyone since then that was willing to do the same thing. Noyes also revealed to Fleming that Alex had explained to Noyes that Alex felt she needed someone in her life that could discipline her in a similar fashion on a regular basis. This made Noyes very excited that he would be able to be a dominate someone in this kind of relationship. Noyes further explained to Fleming that Alex wanted her daughter, Abby, to be impregnated at a young age just like she had been. Noyes also revealed that Alex was currently pregnant and was due to give birth in June 2008.

10. Fleming further explained to your affiant that in early March 2008, she and Noyes traveled together to a medical conference at the West Virginia School of Osteopathic Medicine. The topic of the conference was pediatric osteopathic manipulation. During this trip, Noyes revealed to Fleming that he was attending this conference because he was planning to have Alex move from New Zealand to Erie to live at his residence where he would deliver Alex's new baby. Noyes further revealed to Fleming that his long term intent was to assemble a "family" of female sex slaves that would begin with Alex and Abby. Noyes intended to impregnate Abby when she was between the ages of eight and fourteen and then

continue to breed the future offspring that would result from his plan. Noyes intends to buy a farm or an island where he could put his new society together.

11. Noyes also explained to Fleming that he had informed Alex of his intentions and she was preparing Abby via anal and vaginal dilation, bondage, and having Abby watch pornography while Alex masturbated the child. Noyes told Fleming he wanted her to be a part of his "family" and that if she ever revealed his plans to anyone he would kill her and her family.

12. Shortly after the trip to West Virginia, Noyes showed Fleming the profile that Alex had on the collarme.com website. The profile indicated that Alex was a slave to her father growing up and wanted to be a submissive slave to another person now. Noyes also showed Fleming a photo of Abby which revealed welts on the child's body. Noyes indicated that these welts were caused by a beating from one of Alex's boyfriends, when Abby refused to perform oral sex. When informed of this, Fleming indicated to Noyes that she was glad Abby had refused. Noyes then became angry and said that Abby needed to learn how to be submissive. Noyes also said that he would cut the welts off Abby's body with a razor so that no one would inquire about them. Subsequently, Noyes has indicated that Abby has become much more willing to perform oral sex and has even learned to "deep throat." Noyes also stated that Alex told him that Abby had recently stated "mommy I want a happy cock in my pussy", which Noyes took as a very

positive step in Abby's development as a sex slave. Noyes also finds it charming that one of Abby's favorite toys is a vibrator.

13. Noyes has informed Fleming that the arrival of Alex and Abby from New Zealand has been delayed by immigration issues. Alex is also in the process of selling her house in New Zealand.

14. Noyes also told Fleming that his "family" or "society" would also include a woman named Melissa as a wet nurse for the children. Noyes has also informed Fleming that Melissa utilizes the computer screen name "breederbitch".

15. Fleming has also related to your affiant an instance where she viewed an item indicative of Noyes' sexual interest in children. Sometime between January and April 2008, Fleming was present when Noyes plugged a thumb drive into a computer at the Lake Erie College of Osteopathic Medicine and inadvertently caused a child pornography cartoon to be displayed on the computer's screen. Noyes then quickly closed the image and removed the thumb drive. Fleming then subsequently inquired about the cartoon and Fleming explained that he had several similar images which he needs to discard.

16. Fleming has been under the care of a psychiatrist since the beginning of January 2008. Fleming is being treated for several different issues including depression, anxiety, and male dependence. Fleming reports that she has been diagnosed with borderline personality disorder. Throughout the treatment, Fleming

has been prescribed the medications Celexa, Lamictal, Ritalin, and Xanax.

17. The information that Fleming provided to your affiant also includes a series of e-mails and computer chats which are corroborative of Fleming's account. Specifically, Fleming provided the following:

- a) a March 5, 2008, e-mail from Noyes to Fleming wherein Noyes provides details for his plan regarding his "family" or "society." Fleming also provided an attachment to this e-mail which is a spreadsheet/timeline detailing how Noyes wants to develop his "family."
- b) a March 10, 2008 e-mail from Noyes to Fleming which provides a chat log detailing a chat between Noyes and "breederbitch" which includes a discussion about Noyes coaching Alex on the proper way to prepare Abby for sexual activity. The chat log also includes Noyes' view of "breederbitch"'s role in the pending "family." The chat log also evidences "breederbitch"'s concern that the child slaves be bisexual as opposed to gender specific.
- c) a June 15, 2008, e-mail from Noyes to Fleming updating Fleming on Alex's situation and revealing that Alex had given birth to a child named Morgan around June 10, 2008.

18. On July 31, 2008, your affiant obtained a federal search warrant authorizing the search and seizure of the contents of two of Noyes' e-mail accounts, jeremynoyes@gmail.com and jeremy_noyes@yahoo.com. On August 6, 2008, Google provided your affiant a compact disc containing the contents of the jeremynoyes@gmail.com e-mail account. The information provided by

Google included all of the e-mail messages contained within the jeremynoyes@gmail.com account. On August 11, 2008, your affiant received a compact disc from Yahoo containing the contents of the jeremy_noyes@yahoo.com account. Your affiant's review of that account did not result in the discovery of any images depicting the sexual exploitation of minors. However, your affiant did discover e-mail messages which discussed the sexual exploitation of minors.

19. Your affiant's review of Noyes' Google account revealed the presence of three e-mail messages, dated June 6, 2008, sent from jeremynoyes@gmail.com to an account identified as julliettehodge@gmail.com. Attached to each of these three e-mail messages were numerous images of prepubescent minors engaged in sexually explicit activity. Also included in the attachments are animations depicting the sexual abuse of minors.

20. Your affiant's review also revealed that on July 6, 2008, the account identified as julliettehodge@gmail.com sent eight separate e-mail messages to jeremynoyes@gmail.com which each contained multiple images of minors engaged in sexually explicit conduct. In conjunction with the exchange of the images of child pornography, an instant message exchange occurred between the two accounts wherein each encouraged the other to send more imagery involving minors engaged in sexually explicit conduct.

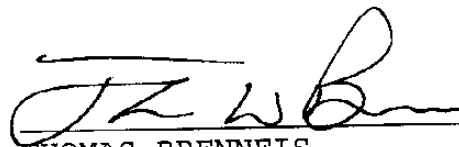
21. Your affiant also discovered that on July 19, 2008, julliettehodge@gmail.com sent jeremynoyes@gmail.com three

additional messages which contained images of minors engaged in sexually explicit conduct.

22. At no time, as reflected in the materials provided by Google, did Jeremy Noyes ever inform julliettehodge@gmail.com that he was no longer interested in receiving material dealing with child sexual exploitation.

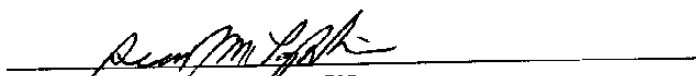
Wherefore, there is probable cause to conclude that Jeremy Noyes has committed the offenses of knowingly transporting and shipping and attempting to transport and ship, in interstate and foreign commerce, specifically, by computer, visual depictions of a minor, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256 and knowingly receiving, distributing, attempting to receive and attempt to distribute any visual depictions of a minor, that had been shipped and transported in interstate commerce, specifically, by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which depict a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(a)(2).

The above information is true and correct to the best of my knowledge, information, and belief.



THOMAS BRENNIS
Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed
in my presence this 13th day of
August, 2008.



SEAN J. MCLAUGHLIN
United States District Judge